

1 Bill Robins III, Esq. (SBN 296101)
2 Robert T. Bryson, Esq. (SBN 156953)
3 Rex Grady, Esq. (SBN 232236)
4 **ROBINS CLOUD LLP**
5 808 Wilshire Blvd., Suite 450
6 Santa Monica, California 90401
7 Telephone: (310) 929-4200
8 Facsimile: (310) 566-5900

5 || Attorneys for Creditor Shawn Merrick

⁶ ||| Matthew W. Grimshaw, Esq. (SBN 210424)

GRIMSHAW LAW GROUP, P.C.

7 || 26 Executive Park, Ste. 250

Irvine, California 92614

⁸ Telephone: (949) 734-0187

Facsimile: (208) 391-7860

Counsel for Robins Cloud LLP

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16 and) Chapter 11
17)
18 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
COMPANY)
19 Debtors)
) DECLARATION OF ROBERT

α_1 Affects:

22 PG&E Corporation) **WITHDRAWAL OF COUNSEL TO**
 Pacific Gas & Electric Co.) **SHAWN MERRICK**

23 | Pacific Gas & Electric Company)

Both Debtors

24 )

²⁵ * All papers shall be filed in the Lead)

25 * All papers shall be filed in the Lead
Case, No. 19-30088 (DM).
26)
)

Declaration of Robert Bryson

I, Robert Bryson, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this declaration.

4 2. I am an attorney with the law firm of Robins Cloud LP (the “Firm”), attorneys of
5 record for Shawn Merrick (“Creditor”).¹ I am duly admitted to practice law before all courts of
6 the State of California and before this court.

7 3. I make this declaration in support of the Firm's motion to be relieved as counsel
8 to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true
9 and within the scope of my personal knowledge, and if called upon to do so I could and would
0 testify competently to these facts.

1 4. On January 29, 2019, Debtors filed voluntary petitions commencing their
2 bankruptcy cases.

13 5. In October 2019, the Firm filed Proof of Claim No. 53718 (“Claim”) on behalf of
14 Creditor. Since filing the Claim, the Firm has been unable to communicate with Creditor. The
15 Firm has attempted to contact Creditor by telephone, email, and letter, all to no avail. Creditor
16 refuses to speak or otherwise communicate with the Firm.

17 6. The Firm hired a private investigator (“Investigator”) to locate Creditor and
18 facilitate communication between the Firm and Creditor. The Investigator failed to locate
19 Creditor.

20 7. The logical inference is that an irreconcilable breakdown in the attorney-client
21 relationship has developed and Creditor no longer desires to be represented by the Firm.

22 8. To the extent that Creditor requests that the Firm turn over any files or
23 information that he is entitled to, the Firm will cooperate and transmit such files.

24 | //

25 | //

26

²⁷ ¹ The Firm retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

1 9. The Firm will cause the Motion to be served on all of the addresses provided to
2 the Firm by Creditor or procured by the Investigator during his attempts to locate Creditor,
3 including the following:

4 6264 Pentz Road, Paradise, CA 95969

5 PO Box 752 Paradise, CA 95967

I declare under penalty of perjury that the foregoing is true and correct. Executed on
February 5, 2021.



Robert Bryson